

Data Submitted (UTC 11): 1/29/2024 2:52:58 PM

First name: CHRIS

Last name: GABRIELLI

Organization:

Title:

Comments: The newly drafted climbing management guidance has raised significant concerns regarding its potential impact on climbers' safety and the profound wilderness experience within our country. By proposing restrictions on fixed anchors, a vital component of climbers' safety systems, the guidance may compromise the ability of climbers to make critical safety decisions in the moment and hinder routine maintenance efforts undertaken by the climbing community. This unwarranted shift not only jeopardizes the safety of climbers but also threatens the rich climbing legacy and the exploration of wilderness areas, undermining the essence of unconfined and primitive climbing experiences.

Specifically, my main concerns are:

1. Fixed anchors represent a crucial component of climbers' safety systems and are not deemed as forbidden "installations" according to the Wilderness Act. Adhering to longstanding climbing policies that have permitted the prudent use of fixed anchors for over half a century will better safeguard Wilderness character while facilitating primitive and unconfined climbing in these areas.
2. Federal agencies adopting new guidance policies to universally prohibit Wilderness climbing anchors contradict decades of allowance, management, and authorization of fixed anchors. Such a shift is unreasonable and overlooks the established practices that have been in place for years.
3. The prohibition of fixed anchors introduces safety concerns by needlessly impeding routine maintenance tasks undertaken by the climbing community. Given that crucial safety decisions often require immediate attention, any authorization process should not hinder these decisions. Effective management of fixed anchor maintenance should encourage safe replacements without jeopardizing climbing routes.
4. Imposing a ban on fixed anchors obstructs the appropriate exploration of Wilderness areas. Land managers should permit climbers to navigate these areas with the flexibility required for spontaneous decisions when navigating intricate vertical terrain.
5. The prohibition of fixed anchors poses a threat to America's esteemed climbing legacy and the potential erasure of some of the world's most significant climbing achievements. Climbing management policy should prioritize the protection of existing routes from removal.
6. Restricting the establishment of new routes to "existing climbing opportunities" on non-Wilderness lands is unenforceable and will create confusion amongst land managers and climbers. Non-Wilderness climbing management policy should maintain opportunities for new anchors unless and until analyses determine climbing should be restricted to protect cultural and natural resources.

Thank you for your time.